

**Draft UNECE People-first PPP Impact Assessment Tool
Public Review
Log of comments and observations (24 August 2020)**

Comment Submitter

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Comment Submitter	The Russian Federation, Department of Economic Sectors Development	E-mail	D18@economy.gov.ru	Delegation / Organization	Department of Economic Sectors Development / Ministry of Economic Development of the Russian Federation	Date submission	24.August.2020
Draft version number	Line number	Comments	Proposed changes	Team Leader Response			
Draft v1.0	578-585	Ge. The verification mechanism of data on certain aspects of PPP projects on the SOURCE platform should be defined in the Evaluation methodology.	Given the experience of the Ministry of Economic Development of the Russian Federation in the PPP database development, filling in data on PPP projects related to corruption activities, quality of goods and services, environmental performance without its additional verification will not contribute to the integrity of information on PPP projects. Thus, the verification mechanism of data should be introduced in the Evaluation methodology, for example, by its documentary confirmation (e.g. signed state environmental expertise conclusions, records of public hearings, adopted anticorruption standards, etc.).	This will be included in the revised version. Verification of data is crucial and it will be included in both the self-assessment tool and in the recognition scheme where certificates will be issued to project proponents after a robust evaluation and verification (of data and documentation) process.			
Draft v1.0	545-548	Ge. The model form of the statement of intent should be developed.	The model form of the statement of intent should be developed by the Project Team and published online.	This will be developed and included in the revised version.			
Draft v1.0	536-541	Ge. The Evaluation methodology should have comprehensive approach within projects evaluation.	The Evaluation methodology should provide an objective evaluation of PPP	This will certainly be a key issue in the recognition scheme, where a			

			projects. For example, if a certain project gains maximum score on its environmental performance, but doesn't provide quality employment, such project can't acquire 'People-first' status.	number of mandatory criteria are identified, such as quality employment, before the People-first PPP designation is given to a project.
Draft v1.0	385-387	Ed. The evaluation criteria 3.7.5 should be deleted.	The evaluation criteria 3.7.5 is a general criteria which is not applicable within the evaluation of a certain PPP project as it refers to the institutional environment of PPP sphere in the country.	The benchmarks and evaluation criteria for Environmental Sustainability and Resilience have been redrafted following comments received during the public review. The Evaluation Methodology is intended to evaluate projects, not governments; however, due to the nature of PPPs and the alignment of this Evaluation Methodology with the SDGs which have macro implications, the Evaluation Methodology includes a mix of micro (project-specific) and macro (government) criteria (for example, the one on zero tolerance to corruption).

Comment Submitter	Christopher CLEMENT-DAVIES	E-mail	c.clement-davies@virginmedia.com	Delegation / Organization	C. Clement-Davies	Date submission	14.August.2020
Draft version number	Line number	Comments		Proposed changes	Team Leader Response		
1.0	N/A	General Comment. This is a remarkable document, for which the UNECE Group and its formidably able team deserve high praise. It is		The changes suggested below are all minor matters of wording and	Noted.		

¹ Types of comment: ge = general; te = technical; le = legal; ed = editorial

		full of helpful, precise, well-considered guidance about how PPP projects can be made more SDG compliant. It could not be more timely, as the infrastructure markets become deeply pre-occupied with ESG issues-a pattern which has become strikingly prevalent in the past couple of years, but has now gone into 'overdrive' with the impact of Covid-19. I remain a little sceptical about the value of the scoring part of the exercise, but never mind. That is just a personal view, and I will be happy to be proved wrong! The thought and precision that have gone into the evaluation criteria are in any event extremely valuable in themselves.	emphasis. They are meant to be helpful suggestions.	
	13-14	'...PPPs moving from being a mere financing tool to becoming an instrument...' I do not think PPPs have ever been seen as mere financing tools. Their justification has always been seen as being about risk transfer in order to deliver infrastructure and/or public services more effectively. But certainly the shift of financing responsibility to the private sector was always an important part of their appeal. Needs a change of emphasis.	"...moving PPPs from being primarily or in large part a financing tool, to becoming much more clearly an instrument..."[continues as before]	Noted.
	19-20	'...putting people at the core'. I would add a reference to the environment. We do need to be a bit careful about the bland use of the phrase 'putting people first' or 'at the core', as that is of course what infrastructure projects are designed to do anyway.	Change to '...putting people and the environment more firmly at the core'.	Noted.
	22/23	Is a 'new model of PPP' an overstatement?	Change to 'revised model'?	PfPPP is a new model. PPP was basically based on economic aspects, while PfPPP gives equal

				weight to the environment as society.
	26	'...that can measure impact and score projects'. Is the language too mathematical? I remain somewhat sceptical about a numbers-based approach. The numbers, where they are used, should definitely not be the main object of the exercise, but a subsidiary benefit. The main value of the exercise lies in helping stakeholders to think clearly about impact and apply the appropriate criteria.	Change to 'add clarity and precision to that impact, measuring and scoring it where appropriate'.	Noted.
	29-30	'...have benchmarks elaborated added that can be scored'. See above and remove the typo.	Change to '...have benchmarks elaborated and applied that can be gauged...'	Noted.
	34	'...realistically few projects can deliver on each...'	Change to ', realistically, only a few projects can fully deliver on....'	Noted.
	42	Perhaps explain how the incentives to go further would work?		Noted.
	43	'...where the emphasis is solely on value for money'. Too sweeping. Please see above.	Change to '...where so much emphasis is placed on 'value for money'	Noted.
	56	'leaves' should be plural.	'leave'	Noted.
	63	'...to properly use the methodology and to develop actual projects' Split infinitive and clumsy phrase at the end.	'...to use the methodology effectively and develop projects that reflect it'.	Noted.
	65	'...a new model'. See comments above.	'...a refined model'	People-first PPP is a new model.
	67/8	'...in new forms of partnerships'	'...in revised forms of partnership'	Noted.
	74	'...people as the main beneficiaries'	'...people and the planet as the main beneficiaries'	Noted.

	78	'...rather weak'.	'...relatively weak'.	Noted.
	84	'...is to deliver high valued quality, People-first PPPs'	'...is to help deliver high-value, high-quality, People-first PPPs'	Noted
	88 et seq.	Introduction. As mentioned above, I remain of the view that the benchmarks are much the most valuable part of this exercise, and that the scoring system will prove difficult to apply effectively and of limited use and appeal. But I will be very happy to be proved wrong about this! Certainly, the attempt to devise a scoring system makes sense. Let's see how well it works in practice.	Add a new short paragraph at line 106 to say as follows: "The benchmarks and evaluation criteria can, of course, be applied to PPPs independently of any scoring system, if stakeholders are at all sceptical about the value or efficacy of the latter. The guidance they embody about how best to give effect to the SDGs in relation to PPPs is, we believe, of real value in itself, and can be applied independently of the numerical tools designed to underpin it. Those benchmarks and criteria represent the core of the whole exercise. The scoring system is an additional evaluation mechanism to facilitate their application'.	Noted
	124 et seq.	'Provision of basic quality services to previously unserved groups'. The benchmark does not seem to allow simply for the provision of better-quality services to groups that are already being served in some way. (The evaluation criteria to give effect to it, on the other hand, allow for this to some extent).	Change to: 'Provision of basic or higher quality services to previously unserved or underserved groups'. If accepted, some consequential changes should be made to the accompanying criteria that follow.	Noted
	144	The word 'transformed' is too strong.	Change to 'improved'.	Noted

	148	'easily affordable'. For very many people, nothing is easily affordable!	I would prefer 'readily affordable'.	Noted
	162	'equal access to the users'. I am not sure this will always be possible for everyone.	Add 'as far as possible'	Noted
	165	Criterion 1.3.2 is very vague. What exactly is it trying to say? What 'mischief' is it seeking to address? And how does it differ from 1.3.5?	Clarify/ 'precise'.	Noted
	181	Criteria 1.4.1 could perhaps be more clearly worded.	Change 'incorporate' to 'address', and 'prevent maintaining' to 'threaten'.	Noted
	191	Should also mention the benefits that flow from simply improving infrastructure (e.g. transport links/energy supply/new facilities etc.)	Add 'improved infrastructure' before 'good quality jobs'.	Noted
	192	'to utilize efficiently all economic assets' It is not clear what exactly this means	Please clarify/re-word phrase.	Noted
	214	Criteria 2.1.2 is a little strange, because it focuses only on 'permits' . Any project will of course need to comply with the requisite legal permits that apply to it, and indeed all laws that govern it. Why highlight permits, which are a relatively routine aspect of those laws. Moreover, this has nothing to do with the SDGs specifically. I would delete it or make it even more general.	Delete or re-word to say; 'Is the project fully compliant with all laws and regulations binding upon it, on a transparent basis, including those that govern its structuring, award and implementation, and all applicable government permits and consents?'	Noted
	217	Re criterion 2.1.3. The exceptions are too narrow. Most countries have a few narrow exceptions to the competitive tendering requirement, which include unsolicited proposals in certain circumstances. (See the Model P-PPP Law and Commentary on this subject).	Reword after 'or,' to say; 'in the case of any legally permissible exceptions, subject to the safeguards and conditions stipulated in the country's laws (and/or in the ZTC standard referred to above) governing such exceptions'.	Noted
	220	Strangely worded!	Would not it be better to say 'Is there any evidence of corruption or undue	Noted

			influence (including from...[contains as before])?	
	229	'..by providing services...' New infrastructure does not always involve the provision of public services, at least not directly.	Change to '...by providing or enabling (directly or indirectly)...	Noted
	239	Criterion 2.2.3. Do we need to add a reference to relevant budgetary constraints somewhere?	Add; 'taking account of relevant (short and long-term) budgetary constraints'.	Noted
	252	A consortium is usually involved rather than a single sponsor.	Add '(or consortium of sponsors/ shareholders)'. Add 'commercial' after 'technical'	Noted
	255	Reference to 'affordability payments' seems to be a typo	Change to 'availability payments'	Noted
	258	The phrase 'secured by an acceptable regulatory regime' is slightly puzzling	Suggest 'compliant with an appropriate regulatory regime'	Noted
	263-4	I would add a reference to political, change of law and force majeure risks	Include in list of risks.	Noted
	268-70	Criterion 2.3.5 These measures are I think rather too specific. Phasing may or may not be appropriate. Design requirements will of course need to be specified. I would widen the criterion considerably.	Re-word to say: 'Has an appropriate set of execution and implementation risk measures been adopted by the project, including (e.g.) precise output specification requirements (and KPIs), a project contract matrix which gives effect to the project's wider risk allocation, effective plans and strategies for design and construction, operation and maintenance, and mechanisms for addressing long-term risks beyond the parties' control which may threaten the project'.	Noted
	286	Should not there also be a reference to 'digitalisation'? (4 th industrial revolution)	Add if appropriate.	Noted

	325	Are there really 'global norms' for GHG emissions?	Change phrase?	Noted
	334	The criteria do not mention avoiding destruction to the existing land environment. Should not that be captured somewhere? The key concern here is deforestation and the destruction of the world's rain forests, which should surely be explicitly mentioned somewhere?	Add a reference to avoiding or reducing the destruction of or harm to existing ecosystems, such as rainforests.	Noted
	378	Criterion 3.7.1 is not explicitly linked to the environment. Should it be?	Add '...of relevance to the environment'	Noted
	4.1.5	I would add another evaluation criteria 4.1.5 to cover IP	Is the project subject to any restrictive IP rights which impede its replicability?	Noted
	457	The phrase 'is arguably the most important' is I think something of an over-statement	Change to 'one of the most important'	Noted
	579	The word 'offer' in the second sentence is not ideal	Change to 'enable'	Noted
	Annex 1	My description (Christopher Clement-Davies)	Please add 'and legal/policy adviser' after 'independent PPP expert'	Noted.

Comment Submitter	UNECE, Max LINSEN	E-mail	maximilianus.linsen@un.org	Delegation / Organization	Convention on the Transboundary Effects of Industrial Accidents, UNECE	Date submission	11.August.2020
Draft version number	Line number	Comments		Proposed changes		Team Leader Response	
Draft v1.0	319	For land environmental sustainability, an evaluation criterion on hazardous substances release is included. We suggest including a similar criterion for Atmospheric		Add a criterion: 'Percentage of particle and evaporated (including hazardous) waste disposed compared to the total		We will include in a separate guide these topics. In current version of the tool (to keep a reduced set of self-assessment benchmarks), we	

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		Environmental Sustainability, to consider national and transboundary effects of industrial accidents.	(including hazardous) waste generated by the project as in ESR 2.2.	have prioritised greenhouse gas emissions and energy efficiency.
Draft v1.0	335	For land environmental sustainability, an evaluation criterion on hazardous substances release is included. We suggest including a similar criterion for Water Environmental Sustainability, to consider national and transboundary effects of industrial accidents.	Add a criterion: 'Percentage of solid and liquid (including hazardous) waste disposed compared to the total (including hazardous) waste generated by the project as in ESR 2.2.	We had revised an existing indicator to include mention of hazardous waste with respect to air, land, and water, within ES2 Improve Land Environmental Sustainability, where the topic of waste, including hazardous waste, is already included.
Draft v1.0	359	The criterion on stakeholder awareness should be specified to make sure that all potentially affected are involved.	Add the wording in bold: 'Is there a plan for strengthening stakeholder disaster awareness through a capacity development for adaptation, mitigation and technology transfer, and development actions, on local, regional, national and transboundary levels ?	Noted. We had included into the text your recommendation accordingly.
Draft v1.0	361	The criterion on early warning should be specified to make sure that all potentially affected are involved/informed on time.	Add the wording in bold: "Is there a plan for developing pre-disaster early warning systems and sensors to inform communities that are potentially affected by the consequence of infrastructure failure following a disaster "?	Noted. We had adjusted the text accordingly.
Draft v1.0	374	The criteria for Disaster Risk Management should be clarified, by including criteria for disaster prevention in addition to disaster preparedness and response. This should be connected directly to potential failure of the infrastructure project assessed.	Add the wording in bold: "Does the project identify preventive measures and preparatory actions before, emergency actions during and recovery and reconstruction actions after natural disasters?"	Noted. We had adjusted the text accordingly.

Comment Submitter	Issa Hassimi DIALLO	E-mail	issahassimidiallo@gmail.com	Delegation / Organization	Coordinator, PPP Unit, MALI	Date submission	10.August.2020
Draft version number	Line number	Comments	Proposed changes	Team Leader Response			
Draft v1.0	94	It would have been useful for the Project Team to provide a tentative weighting and scoring not only for the outcomes, but also for the evaluation criteria for a more comprehensive review of the Impact Assessment Tool.		Noted			
Draft v1.0	129/ 209/ 322/ 412/ 490	The total number of evaluation criteria (104) seems quite high, and can make the implementation of the Impact Assessment Tool cumbersome, costly and time-consuming. Given all the other assessments and due diligences required in the identification, preparation and execution of a PPP project, the Project Team could possibly review this aspect in order to retain a limited and more strategically focused set of benchmarks and evaluation criteria. The objective should possibly not be to cover all aspects of relevant SDGs, but to direct the assessment benchmarks and evaluation criteria to the most critical aspects of compliance with these SDGs.		Noted			
Draft v1.0	144	The formulation of this evaluation criteria (and several others) appears more suitable for an ex post assessment than an ex ante one. The Project Team could review the formulation of such evaluation criteria to render them time-neutral.	For example, instead of : “Have stakeholder lives been transformed as a result of better and more equitable access to the service?”, reformulate the criteria as follows: “Does the project have the potential to transform stakeholder lives as a result of better and more equitable access to the service, or has the project permitted	Noted			

			such a transformation through better and more equitable access to the service?”	
Draft v1.0	165 and 171	There appears to be a level of redundancy between these two evaluation criteria.		Noted
Draft v1.0	183	In the absence of specific information on the scoring methodology, it does not appear clearly how the assessment of this criteria in its current formulation would be measurable and meet the SMART requirement.		Noted
Draft v1.0	212/ 217	These evaluation criteria appear too UNECE-centric. Other leading organizations have developed good quality tools for anti-corruption in PPP project (in addition to existing provisions in national legislations). The formulation of these criteria should therefore be broadened.	Example of alternative formulation for 212: “Have national/international anticorruption measures been complied with, or will they be complied with during project procurement?”	Noted
Draft v1.0	220	Possibly redundant evaluation criteria if 212, 214 and 217 have already been adequately addressed.		Noted
Draft v1.0	228	As for several other evaluation criteria, this criteria is too loaded and requires specific responses to two distinct questions. How would the scoring be done in such case?		Noted
Draft v1.0	245	The relevance of this evaluation criteria should be clarified. Does the criteria imply that the presence of external advisors or international entities is an automatic guaranty for higher quality PPP projects?		Noted
Draft v1.0	255	As for several other evaluation criteria, this criteria is too loaded and requires specific responses to three distinct questions. How would the scoring be done?		Noted
Draft v1.0	272 and 276	How would these evaluation criteria be measured? How much is “many” and how much is “significant”?		Noted
Draft v1.0	359	This evaluation criteria seems to imply that PPP projects should have “a well-articulated Disaster Management Strategy with Disaster Financial Inclusiveness prepared for the project (that incorporates all the elements described for the		Noted

		benchmark)”. The Project Team should clarify where such a requirement is derived from, based on best international PPP practices. PPP projects preparation and due diligences would require a risk analysis (including environmental risks), a risk mitigation strategy and the sharing of risks between public and private partners. What would be the value addition of a Disaster Management Strategy with Disaster Financial Inclusiveness if risk mitigation measures are already contemplated in the PPP process?		
Draft v1.0	427	As for several other evaluation criteria, this criteria is too loaded and requires specific responses to two distinct questions. How would the scoring be done?		Noted
Draft v1.0	438	Given the fact that not all PPP projects have a direct or indirect focus on education, how would a fair assessment of this evaluation criteria be done? Should a PPP project focused on provision of electricity or health services, for example, be scored poorly because of the absence of an affordable and quality education component?		Noted
Draft v1.0	493	“All” relevant project stakeholders would presumably be identified through social and environmental impact assessments. However, how practical, feasible and desirable would it be to have them “all” of them “included in the project decision-making?”. The Project Team may wish to review the formulation of this evaluation criteria, by possibly making reference to representatives of the stakeholders at different phases of the project.		Noted
Draft v1.0	560	The statement made for a differentiated scoring according to the location of the project appears to bring an oversimplification bias to the scoring between developed and developing countries. While poverty might be more pervasive in developing countries, high		For simplification purposes in the self-assessment tool, location will be differentiated by developing and LDCs. In the Certification scheme the location will be more precise

		levels of inequality and exclusion in some developed countries make large segments of their populations as vulnerable as the poor in developing countries. The Project Team may wish to review this statement or the proposed approach to the scoring in order to adhere to the universal nature of the SDGs that pertain to all countries.		and will take into account the issue that you are raising.
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Comment Submitter	Rafael PÉREZ FEITO	E-mail	rperezf@fcc.es	Delegation / Organization	Aqualia	Date submission	7.August.2020
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Draft version number	Line number	Comments	Proposed changes	Team Leader Response
1.0	13-15	<p>This statement seems to assume that all previous PPPs have been considered and used only as a financing tool. In my opinion this is inaccurate in many successful PPPs that have been designed and implemented with a much wider and comprehensive approach than just being a “financial tool”.</p> <p>As a matter of fact, there are many private companies providing basic services to millions of people through infrastructure developed under a PPP scheme, not being these companies mere financial lenders but sophisticated industrial companies transferring, among other things, know-how, innovation and technology on a daily basis and creating significant value an impacts at different levels. Moreover, there are many successful PPPs where the financial commitment is not even required from the private partner.</p>	<p>Adjustment of the statement. Proposal:</p> <p>“That means building up from previous positive experiences with PPPs in order to maintain the concepts of ‘value for people’ and ‘value for the planet’ as the highest priorities”</p>	Noted
1.0	Line 32	While the tool should be used to improve the design and implementation of future PPPs, I understand that the	Alternative wording:	Noted

		<p>tool is going to be calibrated and used with already existing PPPs. In these cases, for different reasons (for example, contractual or time-related reasons), “improving the project” according to the conclusions of the score obtained might not be possible or extremely difficult.</p>	<p>“It is important that the methodology is used to improve projects whenever possible”</p>	
1.0	33-34	<p>If this is a tool to score Public-Private Partnerships, in my opinion, private companies and lenders will benefit from it in many ways as well. It might not be the best alternative to reduce the tools to a policy making guideline.</p> <p>As mentioned before, it seems that this tool will be calibrated and used with already existing PPPs where it might not be easy (or even possible) to “adjust their projects accordingly” (in many occasions, we may be talking about PPPs launched in the 90’s or early 2000’s). Pointing out many areas of improvement of the previous PPP pathfinders according to today’s knowledge and standards may give the impression of deficient ongoing PPPs therefore not being the best way to support the PPPs as an useful scheme for SDGs achievement.</p> <p>Maybe the tool, as it is designed at this moment, has many criteria to show new aspects that have to be considered, but does not seem to appreciate, in terms of scoring (or weighing), what has been very positive in many previous PPPs (for example resilience of projects, innovation, technology and know-how transfer, private financing mobilization, dissemination and show case effects, indirect economic impacts, etc). Maybe this can be addressed through the weighing of the criteria on a later stage.</p>	<p>“But users of the tool can adjust future projects accordingly”.</p> <ul style="list-style-type: none"> - Alternative wording: - Consider potential limitations in existing PPPs through the weighing systems or alternative approaches. <p>Analysis to allow the tool to yield positive scores in more developed countries and PPPs with scopes intentionally focused on some (but not all) of the outcomes underlined by the tool.</p>	Noted
1.0		<p>Regarding the ability of a project to deliver on each of the five outcomes, maybe it is not only that a Project</p>		Noted

		<p>cannot deliver on each of the five outcomes but that such Project is not required to deliver on some of those outcomes because they are already guaranteed or tackled in a different way (therefore they are not the intended goal of the PPP).</p> <p>This opens a debate about this tool being too focused on low income realities. In my opinion, the tool should be useful both for developed and developing countries. Both groups have challenges that have to be addressed and this tool should not be designed in a way in which PPPs in developed countries could eventually be perceived as “worse” because they do not cover or deliver a number of outcomes. If this tool is to support the PPP model as a legitimate one, it should be able to potentially yield equally good marks in any country and Project.</p>		
1.0	43-44	<p>I do not think that this statement is completely accurate. The use of the term “conventional” to describe all the previous PPPs seems to be, at least, questionable. Saying that all of them put an emphasis “solely on value for money” or are less difficult is, again, inaccurate and even unfair as generalization. There are many ongoing and past PPPs with a significant amount of resources and efforts made on several of the fronts highlighted in this draft. In fact, many of them are going to be used to calibrate the tool.</p> <p>The statement “Some People-first PPPs might also be more expensive to do” does not seem to add too much since it is a broad generalization.</p> <p>General comment: the document might be perceived as biased towards what it’s defined as “conventional” PPPs. By establishing two categories of PPPs (“conventional”</p>	<ul style="list-style-type: none"> - Avoid the use of the term “conventional” as a generalization of previous PPPs. - Review of several statements in Chapter I “Avant propos”. <p>Deletion of the statement: “where the emphasis is solely on ‘value for money’. Some People-first PPPs might also be more expensive to do”</p>	Noted

		<p>and “People-first”) and at the same time by declaring that “People-first PPPs” are a new concept, the document seems to attribute all possible positive characteristics to these “new” PPPs in an exclusive way. For example:</p> <ul style="list-style-type: none"> - They realize their social value (line 12) - They are “fit for purpose” (line 13) - They are not a mere financing tool (line 14) - They provide “value for people” or “value for the planet” (lines 14-15) - They foster access to essential public services (lines 18-19) - They put people at the core (lines 19-20) 		
1.0	60-62	At this moment, the tool seems to have already too many indicators. In addition, several of them are difficult to assess and in some cases, even difficult to understand.	Potential reassessment of the number of criteria or proper weighting of the main ones	Noted
1.0	67-68 and 73-74	It would be better to avoid the terms “new” or “old” when discussing forms of partnerships or policies. Maybe the tool will be something “new”, but not many of the policies and forms of partnerships suggested in the “tool”. This “tool” should build up on what has been designed and implemented in the past, which in many cases has been successful and has considered many of the suggestions in this draft.	<p>New wording. Suggestion:</p> <p>“People-first PPP is, after all, a new standard model that is getting started, often in the most challenging of environments.</p> <p><i>... and there are not quick fixes but requires all stakeholders to work together in forms of partnerships over long periods of time.”</i></p>	Noted
1.0	83-85	There may be cases where a “support and capacity-building project facilitation” is not required. Many times, infra Projects have not been executed under a PPP scheme due to a lack of “will” rather than a lack of “capacity”. In fact, nowadays, the vast majority of the Governments are able to, either design and implement a PPP by themselves, or to look for external advice if	<p>Different wording. Proposal:</p> <p>“Where advisable, it is important that the methodology is <u>implemented</u> through support and capacity-building project facilitation in order to assist Governments and any other interested parties and to help them meet their SDG targets”.</p>	Noted

		required (either with multilateral institutions or private companies). This statement restricts the use of the methodology to Governments while it might be useful for the private sector as well (developers, lenders, etc).		
1.0	89-90	It does not seem very clear at this moment how the “self-assessment” and “certification” processes will work but, in my opinion, the latest should be a must before obtaining any recognition. If not, the potential value of the tool becomes much smaller in terms of dissemination, capacity building and best practices demonstration.	N/A	Noted
1.0	131	It would be important that the tool acknowledges the importance not only of serving previously unserved groups but securing and maintaining the access of already served groups. The latest is of critical importance in more developed countries, where PPPs help to guarantee the service in many places where the aging infrastructure is the main problem.	There could be at least two possibilities: 1) Adjusting criterion 1.1 to include the concept of service/infrastructure maintenance or Adding another criterion for this specific aspect and then consider one or the other as applicable	Noted
1.0	142	- Not achieving a 24-hour service does not necessarily mean a worse People-first PPP by itself (a PPP could be a first phase in a more ambitious mid-term plan). It might not even be possible in some cases with specific levels of investment or contract duration. This is particularly challenging in drinking water services, for example (maybe not such an issue in a transportation PPP). - Is the specific reference to “IT service” correct?	Different wording. Proposal: “If among the goals of the project, is the utility service continuously available on a 24-hour basis at the expected date?”	Noted
1.0	143	It could be useful to define “affected” communities.	Addition of definition	Noted

1.0	148-149	<p>- Defining the term affordable could be helpful (e.g.: cost vs family income in percentage). In addition, this concept could be subject to interpretation in specific cases. An alternative to “cost vs family income” could be comparing the cost of access before and after the PPP. For example: access of water and sanitation services in some cases might be above commonly used affordability thresholds (for example, 4% of family income) but still be a fraction of the income spent before the Project (for example, % of family income to buy bottled water).</p> <p>- In addition, I would suggest to add the idea of “project targeted communities”. A project should be inclusive and target all the population of an area, but maybe not all the population of all the areas if it was not intended to (maybe there are other projects targeting other areas and people even under different procurement schemes).</p>	<ul style="list-style-type: none"> - Provide acceptable rules of interpretation for the term “affordable”. - Different wording. Proposal: <p>“Is the service easily affordable for all users, including marginalized and most vulnerable groups of the population targeted by the project?”</p>	Noted
1.0	150-151	<p>Is having a subsidy in place going to be good or bad in terms of scoring of the PPP?</p> <p>If a subsidy, grant, etc is required and, consequently, it is properly designed and/or implemented, I would say that such subsidy or grant is a positive aspect of the PPP because, through a fair mix of revenues, allows the people to have access to basic services they did not have before at an affordable price. But if that subsidy or grant is not properly design and/or implemented, then obviously is a negative aspect of the PPP.</p>	<p>Different wording. Proposal:</p> <p>“If it has been found necessary to protect poorer members of the community through subsidies or other similar schemes, does the project properly address this goal?”</p>	Noted
1.0	152-153	<p>Is it possible to provide a PIA reference so everybody knows what are the expected standards and methodologies to apply?</p>	<p>Addition of a “PIA” definition and valid reference for a calculation methodology.</p>	Noted
1.0	154-155	<p>Measures to improve the affordability of certain services cannot only be adopted through a specific design of a PPP. In fact, there might be more efficient measures to obtain that increase of the affordability than adjusting the design of a PPP. Should a PPP obtain a worse score when other measures (outside the design and</p>	<p>Alternative wording: “When no other measures have been taken outside the PPP, have measures to improve affordability to low-income users been identified, and are there plans to implement and monitor these measures</p>	Noted

		implementation of the PPP) are in place to improve the affordability of a service?	for ongoing effectiveness (e.g., to ensure users are able to continue to afford the service(s) provided) throughout the life of the project?	
1.0	162-164	If a government decides to provide service to marginalized and vulnerable groups in different areas through a mix of public/direct procurement projects and PPPs, is the PPP a worse People-first PPP? Is the PPP going to be scored poorly because of this or it's just a political decision? Aren't we, maybe, expecting a single PPP to address too many of the existing problems if it wants to get high scores with this methodology?. The PPPs can do their share to solve the problems but they are just an instrument that can be used in different ways, with different goals and with different scopes.	Adding "Where intended to" at the beginning of the question.	Noted
1.0	167-168	Would it be possible to qualify the concept of "social impact" so it is not subject to interpretation?	Addition of a "Social impact" calculation definition	Noted
1.0	171	If it does not address it either because such injustice is tackled by other means, is it a worse People-first PPP? How is this situation going to be addressed by the tool?	This issue, shared with other criteria, could be addressed by stating "if required" or "if applicable"	Noted
1.0	181-185	Criteria 1.4.1 and 1.4.2 are key. While providing access to basic services to unserved groups has definitively the greatest impact towards the SDGs, the preservation of that access for already served people is the most pressing SDG related issue in many PPPs (for which, I understand this tool could be useful as well). The investment and management of existing infrastructure is progressively becoming a more urgent issue in many active PPPs. Either because some investment plans are not executed or because the public partner does not have the flexibility to adapt the PPP to new circumstances and needs, sometimes the operational conditions of the infrastructures are degraded (and therefore the services provided by them	Proper weighting of criteria 1.4.1 and 1.4.2	Noted

		are at risk). This is particularly frequent for example in the water and sanitation sector. Therefore, in my opinion, the tool should reflect the preservation of the access, for example with the proper weighing of these two criteria.		
1.0	195	The statement “Because corruption is one of the biggest challenges to the achievement of People-first PPPs” might not be true in many countries and therefore could be perceived as an unfair generalization. There are many places where the problems and challenges to design and implement a proper People-first PPPs are not related (at least not primarily) to corruption issues.	“Because corruption is sometimes a significant challenge to the achievement of People-first PPPs”	Noted
1.0	233-238	1) Could an acceptable “Money for Value” calculation methodology be provided as a reference? 2) Due to (temporary?) financial, institutional, capability difficulties, in many occasions, there are no “public procurement” alternative available in practical time (the actual global infrastructure gap may suggest this). How does the tool account for this? Sometimes we see “value for money” calculations in scenarios where the “public procurement” is purely theoretical or highly unlikely, therefore producing an unrealistic “value for money” alternative analysis.	- Provide a reference for an acceptable “Money for Value” calculation methodology - Alternative wording. Suggestion: “If the “public procurement” alternative is realistically feasible in practical time, will the infrastructure project generate positive value-for-money” This issue is connected to the necessity of elaborating a tool that can yield fair and homogeneous results for PPPs designed and developed in different areas of the world.	Noted
1.0	239-244	Only burdens are highlighted here. It is not uncommon that the public authority cashes in up-front and/or annual fees from the private party as part of the PPP agreements. Therefore I would underline it as something to be considered as well.	The collection of up-front and/or annual fees from the private party could be pointed out as something to be considered when assessing the fiscal sustainability of the PPP as well.	Noted

1.0	248-249	As in criterium (2.2.4), a “where needed” could apply here.	Adding “(where needed)” as in criterium 2.2.4	Noted
1.0	255-260	All these aspects are key for a People-first PPP because they frequently make the difference between a feasible project and an unfeasible project. In my opinion, the specific questions raised in this criterium are so important that could need separate specific criteria for each of them. Although it might be difficult to give specific indications, in my opinion it is important that specific thresholds or guidance are provided to assess the degree of achievement and reduce misinterpretations.	<ul style="list-style-type: none"> - Consider establishing this criteria as a “must-meet”. - Consider separate criteria for the questions raised. Provide specific thresholds or guidance to properly assess the degree of achievement	Noted
1.0	261-264	The risk allocation is another key aspect for any PPP (at any stage of its development). However, as it is now, the criterium seems to request only having a risk matrix in place, without giving any suggestions. Nowadays, I think that there is a wide consensus about a number of risks that should be transferred to the private partner and some others that should not or at least should be carefully analyzed before fully transferring them to the private partner. Leaving this fully open to interpretation could yield a positive score in this criterium just by having a risk matrix, no matter how balanced, realistic and fair it is. It seems that Criterium 2.3.5 (Lines 268-270) points towards this direction. Although it might be difficult to give specific indications, in my opinion it is important that specific thresholds or guidance are provided to assess the degree of achievement and reduce misinterpretations.	Provide specific thresholds or guidance to properly assess the degree of achievement of this criterium	Noted
1.0	265-267	Same comments than for “lines 148-149”	Same proposed changes than for “lines 148-149”	Noted
1.0	268-270	Same comment than for “lines 261-264”	Same proposed changes than for “lines 261-264”	Noted

1.0	272-275	Could some approximate quantitative threshold indication be provided? (e.g.: a percentage of total staff)	Provide an approximate quantitative threshold indication? (e.g.: a percentage of total staff)	Noted
1.0	Line 276	Same comment than for “lines 272-275”	Same proposal than for “line 272-275”	Noted
1.0	Lines 321-375	How is the scoring tool going to address the fact that not all the projects target the same problems and therefore some of the 3.1-3-6 criteria might not apply fully or partially? For example, there are projects (e.g: water) where atmospheric environmental sustainability is not an objective because they do not have any significant impacts on it. Or other projects for which disaster mitigation or flood buffering are out of their reach.	Adjust the scoring methodology to avoid that some projects may have lower scores because, due to its nature, they cannot have a wider scope of positive impacts. For example, weighing system is a possibility or use of (“if applicable due to the nature of the project”) before some of the criteria.	Noted
1.0	Lines 343-346	- Both criteria seem to be intended for the industrial sector (fresh water consumed per unit of output/service and percentage of wastewater treated compared to the total wastewater generated). Therefore, these two criteria should be applicable only in this type of projects. - There is a significant number of water and sanitation PPPs where the scope is providing such services to the population rather than the industrial transformation of specific products. It would be important to include additional criteria to assess the important contribution of these projects to the SDGs	<ul style="list-style-type: none"> - Include “where applicable” in criteria 3.3.1 and 3.3.2 - Include additional criteria for water and sanitation projects which are intended to provide a public service to people (e.g.: additional people served, additional water treated or improved, water pollution avoided, etc). 	Noted
1.0	Lines 379-380	Is there a standard definition of the term “socio-economic indicator” that could be provided to avoid different interpretations?	Provide a standard definition of the term “socio-economic indicator”	Noted
1.0	Lines 385-387	The existence of a national law or policy/strategy/plan is a question for the public authorities and not for a specific PPP (PPPs do not play any part in policy making). In my opinion, one of the challenges of the tool is to establish a methodology that avoids underscoring a good People-first PPP just because its scope is partial and addresses	Avoid using policy making related criteria to score specific PPPs	Noted

		only some of the existing problems: again, not every project can tackle every existing problem in every existing front (in fact, that would probably be very inefficient)		
1.0	Lines 417-419	It would seem reasonable to expect that replicating or enlarging a project would have similar social costs (sometimes smaller due to economies of scale) to those incurred by the project to be replicated.	Wording proposal: “Is it possible to replicate or enlarge the project without any significant additional social cost (...)?”	Noted
1.0	Lines 420-423	It would seem reasonable to expect that replicating or enlarging a project would have similar environmental costs (sometimes smaller due to economies of scale) to those incurred by the project to be replicated	Wording proposal: “Is it possible to replicate or enlarge the project without any significant additional environmental cost (...)?”	Noted
1.0	Lines 424-425	“Simple” and “straightforward” structures sometimes are not seen together with “innovative” structures for obvious reasons (there is always a learning curve). In fact, there are opinions against a continuous innovation of the PPP structures because this could make them difficult to understand, could hinder their implementation and generate unexpected difficulties. Innovative structures could be scored with a separate additional criterium.	Scoring innovative structures under a different additional criterium	Noted
1.0	Lines 427-441	Comment: While these criteria (4.2.1, 4.2.2. and 4.2.3) are very important in certain countries, some of them might not be significant in other places. How is the scoring tool going to avoid lower scores of PPPs that do not cover these topics (capacity building, women empowerment, access to education, etc) simply because they are not intended/required to cover them. If the scoring tool is to be used worldwide and not only in developing countries, this should be taken into account.	Considering some pre-statement pointing out the idea of “where advisable” or “where required”	Noted
1.0	Lines 442-454	Again, these criteria are intended to value impacts that might not be needed (or are not significant) in many countries. If the scoring tool is to be used worldwide and not only in developing countries, this should be taken into account.	Considering some pre-statement pointing out the idea of “where advisable” or “where required”	Noted

1.0	Lines 467-470	The statement “much of the value will be recognised by the wider community and not necessarily by the private investor directly” is a generalization and not necessarily true. In fact, it is unfair to present the idea of a conflict of interest between the public good (promoted by a wider and deeper stakeholder involvement) and the private sector incentives. In order to make the point of the importance of stakeholder involvement is not necessary to justify it with a theoretical interest asymmetry between the “wider community” and the “private sector”.	Statement rewording	Noted
1.0	Lines 480-481	In my opinion, it is necessary to point out the idea of involving the different stakeholders in an efficient way. There are countries where a non-efficient stakeholder involvement process (either because of its design or its implementation) has delayed projects for years.	Including the idea of efficient and proper timing in stakeholder involvement processes to avoid long delays.	Noted
1.0	Lines 536-537	Equal weighting probably is not the best option since it would mean that all the criteria have the same impact.	Elaborate a weighting structure to acknowledge different levels of impact in different criteria. In addition, how are many criteria going to be scored if they do not apply in specific Projects?	Agreed. Weighting is now per benchmark.
1.0	Lines 552-554	In my opinion, project data that could be verified by an independent source should not merit an additional score but even more, for example a distinctive recognition (e.g. quality mention or acknowledgement). If not, these additional score could be “buried” in the noise of the many other scored criteria.	Consider a “quality check” distinction for those projects with “data that could be verified by an independent source” instead of an additional score	Agreed. A different score will be given for verification of data in the self-assessment.
1.0	Lines 560-562	Similarly to comments for lines 552-554, the “Location of the project” could mean a distinctive recognition instead of an additional score. In this way, a double goal is achieved: proper and visible recognition of these projects and reduction of “noise” in the scoring system. In addition, by doing this, the potential negative perception of a PPP for being less “People-first” only	Consider a “value check” distinction for those projects in a “challenging region or country” with “data that could be verified by an independent source” instead of an additional score	The project team considered this topic but decided to score projects in more challenging environments, higher than those in developed countries.

		because it is implemented in a “less challenging” country would be avoided.		
1.0	Lines 564-565	Same comment than for Lines “43-44” above regarding the concept of “new approach to PPPs”. In my opinion, the scoring tool should be more about underlining and promoting specific criteria rather than on saying “this is new and the rest of the PPPs are old and therefore worse”.	Avoiding statements about a “new approach” because in many PPPs many of these criteria have been already applied either fully or partially.	Noted

Comment Submitter	Vincent PIRON	E-mail	vincent.piron@gmail.com	Delegation / Organization	PIRON Consulting	Date submission	7.August.2020
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Draft version number	Line number	Comments	Proposed changes	Team Leader Response
V1.0	239	Tolls or fees have the most crucial impact on fiscal sustainability	Add “Had a tolling system be checked in terms of political and technical feasibility?”	Noted
V1.0	239	Positive fiscal impact of a good project	Has the positive fiscal impact of the additional economic activities of the project been evaluated and taken into account?	Noted
V1.0	239	Keynesian multipliers	Has the Keynesian multipliers been taken into account during the work period?	Noted
V1.0	239	Taxation of the additional economic activity	Has the effective taxation rate of the additional economic activity been taken into account?	Noted

Comment Submitter	Narantsetseg PUREV	E-mail	p_narantsetseg@hotmail.com	Delegation / Organization	Private consultant	Date submission	3.August.2020
Draft version number	Line number	Comments	Proposed changes	Team Leader Response			
V1.0	1-87	You did great. Thanks for this great and very well work on PfPPPs. The next most significant approaches and methodologies included in part “Avant propos”: -Need of New Approach for PfPPPs -Evaluation methodologies and its main specifics -Benchmarks of evaluation methodologies -need of government to support new evaluation methodology.	No any suggestions.	Noted. Thank you.			
V1.0	88-110	Well done. Main elements of methodology and benchmarks for outcomes are identified in the introduction part detail and clear.	No any suggestions.	Noted. Thank you.			
V1.0	111-187	You did great. The relevant definition of access and equity, benchmarks and evaluation criteria to Access and Equity are specified clear, detail and well in the subchapter 3.1 Access and Equity- “Benchmarks and evaluation criteria for the people fist outcomes”.	No any suggestions.	Noted. Thank you.			
V1.0	188-297	Great job. This chapter identified corruption is one of the biggest challenges for PfPPPs achievements. The relevant definition of access and equity, benchmarks and evaluation criteria to Economic Effectiveness and Fiscal sustainability is specified clear, detail and well in the subchapter 3.2.	No any suggestions.	Noted. Thank you.			
V1.0	298-389	Well done. The relevant definition, benchmarks and evaluation criteria to environmental sustainability and resilience is specified clear, detail and well in the subchapter 3.3.	No any suggestions.	Noted. Thank you.			

V1.0	390-454	You did great. The relevant definition, benchmarks and evaluation criteria to replicability is specified clear, detail and well in the subchapter 3.4.	No any suggestions.	Noted. Thank you.
V1.0	455-533	Very well job. The relevant definition, benchmarks and evaluation criteria to stakeholder engagement is specified clear, detail and well in the subchapter 3.4.	No any suggestions.	Noted. Thank you.
V1.0	534-572	Weighting and scoring of the outcomes are identified well and clear in chapter 4. 100 points for each outcome and total score is 500 points. Weighting and scoring infrastructure projects are important for measuring implementing projects and their implementation rate and level.	No any suggestions.	Thank you for your comment.
V1.0	573-597	Implementation is explained and identified in chapter 5 clear and well. Implementation is consisted of two elements such as self-assessment tool and certification scheme. Those elements of implementation is identified clear.	No any suggestions.	Thank you for your comment.
V1.0	1-597	I would like to express my gratitude to the UNECE Team for PfPPP, in particular to Geoffrey, Tony and Claudio and other professionals and officials. You did great, very well job. This work is crucial for the defining results of infrastructure investments and financing and implementation. Many thank for this great job. I wish great success in your further global works contributing to PPP development.	No any suggestions.	Thank you for your comment and support.

Comment Submitter	Vincent PIRON	E-mail	vincent.piron@gmail.com	Delegation / Organization	PIRON Consulting	Date submission	28.June.2020
Draft version number	Line number	Comments	Proposed changes	Team Leader Response			
Draft V1.0	231	Usually the decision to implement a project is taken after a Cost Benefit Analysis (CBA) is completed, precisely to evaluate the full project impacts. There are well known rules to do that, measuring increase of productivity and/or welfare. The law should remind that a CBA is the best way to thoroughly evaluate a project and measure the "People First" efficiency.	Will the infrastructure project deliver net tangible and intangible benefits to society by providing services to a consistently higher standard (e.g., quality school infrastructure leading to improved educational outcomes; improved cleanliness of the hospital leading to lower in-hospital infection rates), <u>increasing productivity and efficiency or enhancing people's welfare (as presented usually in Cost Benefit Analysis)</u> , and can these benefits be verified (e.g. through certification, ISO or otherwise)?	Noted.			